



Department of Toxic Substances Control



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SCHOOLS HAZARDOUS WASTE COLLECTION, CONSOLIDATION, AND ACCUMULATION FACILITY (SHWCCAF) PERMIT-BY-RULE (PBR) AUTHORIZATION (R-00-09)

FINAL STATEMENT OF REASONS

UPDATE OF INITIAL STATEMENT OF REASONS

As authorized by Government Code section 11346.9(d), the Department of Toxic Substances Control (DTSC) incorporates by reference the Initial Statement of Reasons prepared for this rulemaking.

No changes were made to the proposed regulations following the public hearing and 45-day public comment period.

ALTERNATIVES DETERMINATION

DTSC has determined that no alternative would be more effective in carrying out the purpose for which the regulations are proposed or would be as effective and less burdensome to affected private persons than the proposed regulations.

LOCAL MANDATE DETERMINATION

The proposed regulations do not impose any mandate on local agencies or school districts.

SUMMARY AND RESPONSE TO COMMENTS

No oral comments were given at the public hearing held October 30, 2001. One written comment was received on the initial proposal during the public comment period. This comment was from Stanley H. Pine, California State University, Los Angeles.

Comment from Stanley H. Pine: The comment was made to support the provisions of the proposed regulations. The commentator stated that 1) the regulations would markedly reduce the cost and complexity of school districts collecting and transferring waste; 2) there should be no additional risks associated with the regulations since safety practices to protect human health and the environment would still be followed; and 3) many states already follow procedures similar to the proposed regulations and the commentator is not aware of any negative results.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

Response: DTSC acknowledges the support expressed for the proposed regulations. No changes to or concerns with the proposed regulations are identified by the commentor. Therefore, no changes have been made to the proposed regulations in response to the comment.